

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v. : DATE FILED: September 26, 2007**

ANGEL SANTOS	:	<b>VIOLATIONS:</b>
	:	<b>21 U.S.C. § 841(a)(1), (b)(1)(C)</b>
	:	<b>(distribution of heroin - 2 counts)</b>
	:	<b>21 U.S.C. § 841(a)(1), (b)(1)(B)</b>
	:	<b>(possession with intent to distribute 100</b>
	:	<b>grams or more of heroin - 1 count)</b>
	:	<b>Notice of forfeiture</b>

## INDICTMENT

**COUNT ONE**

## THE GRAND JURY CHARGES THAT:

On or about October 19, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANGEL SANTOS**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 30, 2006, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**ANGEL SANTOS**

knowingly and intentionally distributed a mixture and substance containing a detectable amount  
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 27, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANGEL SANTOS**

knowingly and intentionally possessed with the intent to distribute 100 grams or more, that is, approximately 107 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

#### **ANGEL SANTOS**

shall forfeit to the United States:

a. any and all real or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations; and

b. any and all real or personal property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

---

**FOREPERSON**

---

**PATRICK L. MEEHAN**  
*United States Attorney*